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12/19/03

PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re application of	)	
	)	
Paul S. Germscheid et al.	)	Examiner L. Wassum
	)	
Serial No. 09/448,164	)	Group Art Unit 2177
	)	
Filing Date: 11/24/99	)	
	)	**APPEAL BRIEF**

For: METHOD AND APPARATUS FOR A WEB APPLICATION SERVER TO CREATE AN
EMPTY DATA SET IN A REPOSITORY WITH A SPECIFIED ID SET

Docket No.: 33012/277/101

<u>APPELLANT'S BRIEF</u>
<u>FILED UNDER 37 C.F.R. § 1.192(d)</u>
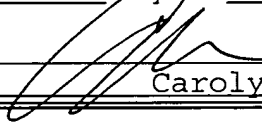
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Dear Sir:

This appeal brief is being filed in triplicate within sixty

days of the Notice of Appeal filed on October 9, 2003. Permission

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is hereby granted to charge or credit deposit account number 14-0620 for any errors in fee calculation. Appellants request this Appeal Brief be made of record and fully considered.

REAL PARTY IN INTEREST

The Real Party in interest is:

Unisys Corporation

Township Line and Union Meeting Roads

Blue Bell, Pennsylvania 19424

being the assignee of the entire right, title, and interest by all inventors, by way of assignment documents filed at Reel 010418, frame 0518, in the United States Patent and Trademark Office.

RELATED APPEALS AND INTERFERENCES

There are no known pending Appeals and/or Interferences which will directly affect or be directly affected by or have a bearing on the Board's decision in this appeal.

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STATUS OF CLAIMS

The subject patent application was filed on November 24, 1999 containing claims 1-20. By way of a first official action mailed January 16, 2002, all pending claims (i.e., claims 1-20) were rejected as unpatentable over the prior art of record. The claims were amended by way of amendments filed April 25, 2002, December 16, 2002, and April 22, 2003. None of the pending claims was ever found patentable over the prior art of record. Claims 1-20, herein appealed, stand finally rejected and are presented in Appendix A, in the form following the amendment filed April 22, 2003.

STATUS OF THE AMENDMENTS

The amendments filed April 25, 2002, December 16, 2002, and April 22, 2003 has been entered. An amendment after final filed under 37 C.F.R. 1.116 on September 24, 2002 was not entered by the Examiner. However, the substance of this amendment was included in a Preliminary Amendment filed with a Request for Continued Examination filed on December 16, 2002. As indicated above, this Preliminary Amendment was entered.

SUMMARY OF INVENTION [1]

The present invention generally relates to database management systems and more particularly relates to enhancements for providing access to database management systems via Internet user terminals[2]. There are two basic problems with permitting Internet access to a proprietary data base[3]. The first is a matter of security[4]. Because the Internet is basically a means to publish information, great care must be taken to avoid intentional or inadvertent access to certain data by unauthorized Internet users[5]. In practice this is substantially complicated by the need to provide various levels of authorization to Internet users to take full advantage of the technique[6].

The second major problem is imposed by the Internet protocol itself[7]. One of the characteristics of the Internet which makes it so universal is that any single transaction in HTML language combines a single transfer (or request) from a user coupled with a single response from the Internet server[8]. In general, there is no

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[1] The references to the specification and drawings provided herein are only exemplary and are not deemed to be limiting. The purpose of the references is to enable the Board to more quickly determine where the claimed subject matter is described within the present application.
[2] See Specification at page 4 lines 3-5.
[3] See Specification at page 6, line 2.
[4] See Specification at page 6, line 3.
[5] See Specification at page 6, lines 3-5.
[6] See Specification at page 6, lines 5-6.
[7] See Specification at page 6, line 22.
[8] See Specification at page 6, line 22, through page 7, line 3.

means for linking multiple transfers (or requests) and multiple responses[9]. In this manner, the Internet utilizes a transaction model which may be referred to as "stateless"[10]. This limitation ensures that the Internet, its users, and its servers remain sufficiently independent during operation that no one entity or group of entities can unduly delay or "hang-up" the communications system or any of its major components[11]. Each transmission results in a termination of the transaction[12]. Thus, there is no general purpose means to link data from on Internet transaction to another, even though in certain specialized applications limited amounts of data may be coupled using "cookies" or via attaching data to a specific HTML screen[13]. However, some of the most powerful data base management functions or services of necessity rely on coupling data from one transaction to another in dialog fashion[14].

The present invention overcomes the disadvantages of the prior art by providing a method of and apparatus for utilizing the power of a full featured data base management system by a user at a terminal coupled to the world wide web or Internet while

[9]See Specification at page 7, lines 3-4.
[10]See Specification at page 7, lines 4-5.
[11]See Specification at page 7, lines 5-7.
[12]See Specification at page 7, lines 7-8.
[13]See Specification at page 7, lines 8-10.
[14]See Specification at page 7, lines 11-12.

maintaining security[15].   In order to permit any such access, the present invention must first provide an interface, herein referred to generically as a gateway, which translates transaction data transferred from the user over the Internet in HTML format into a format from which data base management system commands and inputs may be generated[16].   The gateway must also convert the data base management system responses and outputs for usage on the user's Internet terminal[17].   Thus, as a minimum, the gateway must make these format and protocol conversions[18].   In the preferred embodiment, the gateway resides in teh web server coupled to the user via the world wide web and coupled to proprietary data base management system[19].

A repository is established to store the state of the service request sequence[20].   As such, the repository can store intermediate requests and responses, as well as other data associated with the service request sequence[21].   Thus, the repository buffers commands, data, and intermediate products utilized in formatting subsequent data base management service requests and in formatting subsequent

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[15]See Specification at page 8, lines 3-5.
[16]See Specification at page 8, lines 5-9.
[17]See Specification at page 8, lines 9-10.
[18]See Specification at page 8, lines 10-11.
[19]See Specification at page 8, lines 11-13.
[20]See Specification at page 10, line 12.
[21]See Specification at page 10, lines 12-14.

data to be available to the user's browser[22]. Through the use of a repository to store the state of the service request sequence, the service handler to execute data base management commands, the world wide web user is capable of performing each and every data base management function available to any user, including a user from a proprietary terminal having a dedicated communication link which is co-located with the proprietary data base management system hardware and software[23].

In accordance with the preferred mode of the present invention, a web application server can create an empty data set in the repository utilizing a specified DataSetID[24]. It provides a mechanism to create the table in a non-relational database, which is then mapped to an ADO (Active Data Object) record set[25]. This technique does not require the use of the SQL (System Query Language) command interface[26]. The empty table is dynamically created in the repository using an ASP (Active Server Page) on a web application server, which is brought into an ADO record set and may later be populated[27]. If a data base provider supported ODBC

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[22]See Specification at page 10, lines 14-16.
[23]See Specification at page 10, line 20, through page 11, line 2.
[24]See Specification at page 11, lines 5-6.
[25]See Specification at page 11, lines 6-8.
[26]See Specification at page 11, line 8.
[27]See Specification at page 11, lines 8-10.

and table creation, then the SQL sequence for create table could have been used[28]. However, not all data base providers support this interface[29].

After initially determining if a user's access profile has been validated against the database's profile, the web application server creates an empty data set using the input parameters for the data set name, column names, and column widths[30]. The empty data set is saved in the repository with the specified DataSetID[31]. The resulting data set is then associated with an ADO record set[32].

ISSUES

1. Are claims 1-4, 6-8, 11-14, and 16-18 unpatentable under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,266,673, issued to Hong et al (hereinafter referred to as "Hong")?

2. Are claims 5, 9-10, 15, and 19-20 unpatentable under 35 U.S.C. 103(a) as being obvious over U.S. Patent No. 6,266,673, issued to Hong et al (hereinafter referred to as "Hong") in view of the publication "Why Do I need Cool ICE" (hereinafter referred to as "Unisys")?

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[28]See Specification at page 11, lines 10-12.
[29]See Specification at page 11, line 12.
[30]See Specification at page 11, lines 13-15.
[31]See Specification at page 11, lines 15-16.
[32]See Specification at page 11, lines 16-17.

GROUPING OF CLAIMS

Applicants have received four (4) official actions, each rejecting all pending claims (i.e., claims 1-20). In each of these four official actions the Examiner has addressed the pending independent claims individually and has made individual rejections accordingly. Similarly, Applicants have always addressed each of the pending 20 claims individually. Therefore, it is deemed that pending claims 1-20 are patentably distinct from one another for the reasons provided in the arguments below. Thus, none of appealed claims 1-20 stand or fall together.

ARGUMENT

I.   Claims 1-4, 6-8, 11-14, and 16-18 are not unpatentable under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,266,673, issued to Hong et al (hereinafter referred to as "Hong").

The present invention as disclosed and claimed is limited to a system having a user terminal coupled to a data base management system via a publically accessible digital data communication network (e.g., the Internet). The user terminal generates and transfers a service request to the data base management system via the publically accessible digital data communication network, which creates a non-relational empty data set with a specified data set ID within the data base management system. To find anticipation, MPEP 2131 obligates the Examiner to find each of these elements "expressly" or "inherently" within Hong. In making his rejection, the Examiner has not complied with MPEP 2131 and has clearly erroneously found that Hong anticipates the claimed invention.

Specifically, it is Applicants' position that, unlike the claimed invention, the functionality of Hong most related to the claimed invention occurs exclusively within a single computer (i.e., computer system 100 of Fig. 1). Hong plainly states at column 4, lines 39-40:

> The invention is related to the use of computer system 100 for generating and using references to objects in a database. (emphasis added)

Hong further states at column 6, lines 11-14:

> In the computer system 100 of FIG. 1, sequences of instructions comprised by the DBMS are executed by the processor 104 to carry out requests of a database client.

Thus, according to Hong, computer system 100 hosts those data base management functions relied upon by the Examiner to support his anticipation rejection. In other words, the data base server 202[33] and data base client 208 are co-located within computer system 100.

Though Hong does not disclose any "user terminal", as claimed, it does disclose display 112, input device 114, and cursor control 116 coupled to computer 100 via bus 102[34]. However, these do not constitute the claimed "Internet or user terminal" as defined in Applicants' specification[35] or as utilized within the art.

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[33]Column 6, lines 7-8 state: "A database server is a computer program or group of computer programs........
[34]See column 4, lines 26-34.
[35]See specification at page 19, lines 3-6, for example.

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In response to Applicants' arguments, the Examiner continues
to reiterate:

> ....the reference teaches a system with a client user
> Internet terminal and a database management system
> running on a terminal remote from the client and
> accessible over the Internet.....

This finding is not supported by either the drawings or the text of
Hong. He attempts to support this inference by quoting Hong column
6, lines 9-21:

> A database client may be a computer system, including the
> computer system executing the DBMS, or another computer
> system executing another DBMS. In computer system 100 of
> FIG. 1, sequences of instructions comprised by the DBMS
> are executed by the processor 104 to carry out requests
> of a database client....The requests of a database client
> may themselves be issued in response to requests received
> from a (sic) individual through a user interface provided
> by the client.

Hong shows only one computer system (i.e., computer system 100) and
only one human user interface (i.e., display 112 and cursor control
116)[36]. It is baffling to contemplate that the Examiner not only
postulates other computers, but speculates on the manner whereby
they are coupled.

Apparently recognizing the lack of express showing of the
claimed elements within Hong, the Examiner states:

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[36]See Hong Fig. 1.

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Furthermore, the fact that "requests can be received from an individual through a user interface provided by a client" renders the existence of the claimed "user terminal" inherent in the client system.

Not only is this finding of inherency incorrect as a matter of law for not having met the burden provided by MPEP 2112, it is contrary to the teaching of Hong. As explained above, the only human user interface provided by Hong are display 112, input device 114, and cursor control 116, specifically coupled to computer 100. Again, the Examiner has attempted to read all of the claimed elements onto Hong's computer 100.

In an apparent attempt to complete the "circle", the Examiner states:

> In the examiner's opinion, the computer disclosed in Hong et al. reference, at col. 4, line 7 through col. 6, line 2 et seq., clearly qualifies as a user terminal as claimed and defined in the specification.

In other words, the Examiner has expressly found that the claimed "data base management system" and the "user terminal" are both found in Hong as computer 100. Yet contrary to controlling law, he continues to hold that the claimed invention is anticipated by Hong.

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I.A. Claim 1 is not anticipated by Hong.

In rejecting claim 1, the Examiner reads claim elements a) and

c) on the same structure within Hong stating:

> a) an Internet terminal (see <u>col. 2, line 60 through col.
> 3, line 6; see also col. 5, lines 25-64</u>);

> and

> c) a database management system having at least one
> database responsively coupled to said publicly accessible
> digital data network (see <u>col. 2, line 60 through col. 3,
> line 6; see also col. 5, lines 25-64</u>; see also col. 6,
> lines 22-64);   (emphasis added)

Though Applicants have admitted that Hong discloses the Internet

(see claim element b), it certainly cannot couple elements a) and

c), which are in fact the same element, Hong computer 100. As

explained above, coupling these elements over the "publically

accessible digital data communication network" as in the claimed

invention rather than within the same computer (i.e., computer 100)

as in Hong, has substantial structural implications for the

providing of security and protocol conversion.

As if to further confuse the process, in reading Hong on to claim element d), the Examiner references more than two columns of text stating:

> .....see also extensive discussion of the generation of table and object identification numbers, col. 6, line 65 through col. 8, line 67).

Actually, claim element d) is limited by "....creates a <u>non-relational</u> empty data set.....". This is specifically not found in Hong which states at column 1, lines 16-18:

> The invention relates to <u>object-relational</u> database, and in particular, methods of referring to objects contained in <u>object-relational</u> databases. (emphasis added)

Again, the Examiner has continued to ignore the clear teaching of Hong.

The rejection of claim 1 should be reversed for failure of the Examiner to show that Hong expressly or inherently discloses all of the claim limitations, for clearly erroneous findings of fact in support of his rejection, and for failure of the Examiner to comply with controlling law (e.g., MPEP 2112) in finding inherency.

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I.B. Claim 2 is not anticipated by Hong.

Claim 2 depends from claim 1 and is further limited "a repository in which said non-relational empty data set is created". In making his rejection, the Examiner states:

> Regarding claims 2, 7, and 13, Hong et al. additionally teaches an improvement, method and apparatus wherein said database management system futher comprises a repository in which said non-relational empty data set is created (see Figure 2; see also col. 6, lines 22-64).

As should be readily apparent, the Examiner's citations of Hong have nothing to do with the claim limitations of claim 2. The Examiner's rejection of claim 2 should be reversed as based upon clearly erroneous findings of fact.

I.C. Claim 3 is not anticipated by Hong.

Claim 3 depends from claim 2 and is further limited by "a parameter set associated with said non-SQL service request whereby said non-relational empty data set is created in accordance with said parameter set". Again, as if to specifically generate confusion, the Examiner cites col. 7, lines 7-12 and 38-40, which specifically show SQL statements utilized with a relational data base (see column 1, lines 16-18. The rejection of claim 3 should be reversed for at least being based upon clearly erroneous findings of fact.

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I.D. Claim 4 is not anticipated by Hong.

Claim 4 depends from claim 3 and further limits the "publically accessible digital data communication network". Though Hong admittedly mentions the Internet, as explained above, the Internet has nothing to do with the functional couplings within computer 100. The rejection of claim 4 should be reversed as based upon clearly erroneous findings of fact.

I.E. Claim 6 is not anticipated by Hong.

Claim 6 is an independent apparatus claim wherein the Examiner has made many of the mistakes mentioned above in support of his rejection. He again reads computer 100 of Hong on to both "Internet terminal" and "data base management system" as above. He again rejects the limitation of "a non-relational empty data set", wherein Hong at column 1, lines 16-18, expressly limits its attention to "object-relational databases". He again attempts to confuse the situation by citing large amounts of irrelevant text. The rejection of claim 6 should be reversed as based upon clearly erroneous findings of fact and improper application of controlling law.

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I.F. Claim 7 is not anticipated by Hong.

Claim 7 depends from claim 6 and is further limited by "a repository in which said empty data set is created". As explained above with regard to the rejection of claim 2, Hong, Fig. 2 and column 6, lines 22-64, do not show a "repository", do not mention a repository, nor say anything of an empty data set created in a repository as claimed. The rejection of claim 7 should be reversed as based upon clearly erroneous findings of fact.

I.G. Claim 8 is not anticipated by Hong.

Claim 8 depends from claim 7 and further limits the service request by "a non-SQL service request having a parameter set which defines said empty data set". In making his rejection, the Examiner cites Hong, column 7, lines 7-12, and lines 38-40, which describe SQL service requests. The rejection of claim 8 should be reversed as based upon clearly erroneous findings of fact.

I.H. Claim 11 is not anticipated by Hong.

Claim 11 is an independent method claim having three individual steps. Hong has none of these steps. As to the first step, the only network transfer mentioned by Hong is at column 5, lines 58-61, which involves the transfer of the script from a

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computer program. As to the second step, there is no discussion of the receipt of a service request from a network. Finally, with regard to step three, Hong only discusses SQL manipulation of a relational data base. Hong has no non-SQL service requests and no non-relational data base. The rejection of claim 11 should be reversed as based upon clearly erroneous findings of fact.

I.I.   Claim 12 is not anticipated by Hong.

Claim 12 depends from claim 11 and is further limited by "defining said non-relational empty data set in response to parameters associated with said service request". In making his rejection, the Examiner does not acknowledge that Hong is limited to discussions concerning relational databases (see column 1, lines 16-18). The rejection of claim 12 should reversed as based upon clearly erroneous findings of fact.

I.J.   Claim 13 is not anticipated by Hong.

Claim 13 depends from claim 12 and is further limited by "creating said non-relational empty data set within a repository of said data base management system". Hong has no "repository". Hong has no "empty data set". Hong has no "non-relational data set". The Examiner confusingly cites Fig. 2 and column 6, lines 22-64, of

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Hong. These citations say nothing of the claim limitation. The rejection of claim 13 should be reversed as based upon clearly erroneous findings of fact.

I.K. Claim 14 is not anticipated by Hong.

Claim 14 depends from claim 13 and further limits the "publically accessible digital data communication network". As explained above, Hong does not "transfer" or "receive" via the "publically accessible digital data communication network as found in claim 11. Therefore, Hong cannot contain the further limitation of claim 14.

I.L. Claim 16 is not anticipated by Hong.

Claim 16 is an independent apparatus claim having "means-plus-function" limitations. As such, the Examiner is required to perform his examination in accordance with MPEP 2181 et seq. which he has clearly not done. In addition, he has clearly read computer 100 of Hong on to both element a) and element b) in opposition to controlling law. Therefore, the rejection of claim 16 should be reversed as legally incorrect in addition to being based upon clearly erroneous findings of fact.

I.M. Claim 17 is not anticipated by Hong.

Claim 17 depends from claim 16 and further limits the coupling network. Because Hong has no such coupling, it cannot have the further limited coupling. The rejection of claim 17 should be reversed as based upon clearly erroneous findings of fact.

I.N. Claim 18 is not anticipated by Hong.

Claim 18 depends from claim 19 and further limits the "permitting means". In making his rejection, the Examiner ignores the requirements of MPEP 2181 et seq. and instead makes clearly erroneous findings of fact and quotes extensive portions of the text of Hong. The rejection of claim 18 should be therefore reversed.

II. Claims 5, 9-10, 15, and 19-20 are not unpatentable under 35 U.S.C. 103(a) as being obvious over U.S. Patent No. 6,266,673, issued to Hong et al (hereinafter referred to as "Hong") in view of the publication "Why Do I need Cool ICE" (hereinafter referred to as "Unisys")

MPEP 2143 specifies the three required showings for the Examiner to make a *prima facie* case of obviousness. These requirements are: 1)motivation to make the alleged combination;

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2) reasonable likelihood of success of the alleged combination; and

3) all claim elements in alleged combination.   The Examiner has not

met his burden and therefore has not presented a *prima facie* case

of obviousness.   The rejection of claims 5, 9-10, 15, and 19-20

should be reversed for failure of th3e Examiner to present a *prima*

facie case of obviousness.

As to lack of motivation, Hong states at column 1, line 16-18:

> The invention relates to object-relational databases, and
> in particular, methods of referring to objects contained
> in object-relational databases.

This statement specifically excludes MAPPER which is not an

"object-relational database".

As to reasonable likelihood of success, because Hong assumes

an object-relational data base and MAPPER is not, the alleged

combination would clearly not work without substantial

modifications to both MAPPER and the system of Hong.

Without addressing these issues, the Examiner irrelevantly

states:

> It would have been obvious to one of ordinary skill in
> the art at the time of the invention to use MAPPER as the
> database management system, since (sic) MAPPER has been
> tuned for reliability, scalability, and high performance,
> and the technology has been used for years by thousands
> of users for many different kinds of applications, and
> has gained a reputation for performing well for
> everything from small data analysis applications to huge
> transaction systems, and has exemplary reliability.

When the incompatibilities between Hong and MAPPER were brought to
the Examiner's attention, he stated:

> Regarding the applicants' arguments that the examiner has
> failed to meet the requirements of MPEP §2143 in showing
> obviousness, the examiner respectfully responds that the
> secondary reference, both in general and particularly in
> the specific portions cited in the rejection of record,
> supplies ample motivation to incorporate the MAPPER
> database management system, as well as providing reasons
> for expectfing success in the combination.

II.A. Claim 5 is not obvious over Hong in view of Unisys.

Claim 5 depends from claim 4 and is further limited by "
wherein said data base management system is MAPPER". The rejection
of claim 5 should be reversed for failure of the Examiner to
present a *prima facie* case of obviousness.

II.B. Claim 9 is not obvious over Hong in view of Unisys.

Claim 9 depends from claim 8 and further limits by "wherein
said data base management system further comprises MAPPER". The
rejection of claim 9 should be reversed for failure of the Examiner
to provide the required showings under MPEP 2143.

II.C. Claim 10 is not obvious over Hong in view of Unisys.

Claim 10 depends from claim 9 and further limits the "publically accessible digital data communication network". Hong has no such network coupling the element of claim 6 from which claim 10 depends. Therefore, the rejection of claim 10 should be reversed for failure of the Examiner to make a *prima facie* case of obviousness.

II.D. Claim 15 is not obvious over Hong in view of Unisys.

Claim 15 depends from claim 14 and further limits the "remote data base management system". The rejection of claim 15 should be reversed for failure of the Examiner to make a *prima facie* case of obviousness.

II.E. Claim 19 is not obvious over Hong in view of Unisys.

Claim 19 depends from claim 18 and further limits the "offering means". In making his rejection the Examiner does not even acknowledge the procedural requirements of MPEP 2181 et seq. The rejection of claim 19 should be reversed for failure of the Examiner to provide the required showings of MPEP 2143 and for failure of the Examiner to perform the required examination.

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II.F. Claim 20 is not obvious over Hong in view of Unisys.

Claim 20 depends from claim 19 and further limits the "permitting means". The additional limitation restricts the software architecture of the "permitting means". Though the Examiner irrelevantly cites column 4, lines 7-38 and column 5, lines 25-64 of Hong, the reference says nothing of the software architecture of computer 100. In making his rejection the Examiner does not even acknowledge the procedural requirements of MPEP 2181 et seq. The rejection of claim 20 should be reversed for failure of the Examiner to provide the required showings of MPEP 2143 and for failure of the Examiner to perform the required examination.

CONCLUSION

Having thus reviewed the final rejections of claims 1-20, being all pending claims, it seems abundantly clear that the limitations of these claims are not unpatentable in view of the prior art of record. Thus, the rejection of these claims should be reversed as being based upon clearly erroneous fact findings and errors of law.

Respectfully submitted

Paul S. Germscheid et al

By their attorney,

Date December 8, 2003

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APPENDIX A

1. In a data processing environment the improvement comprising;

    a. an Internet terminal;

    b. a publically accessible digital data communication network responsively coupled to said Internet terminal;

    c. a data base management system having at least one data base responsively coupled to said publically accessible digital data network; and

    d. a service request generated by said Internet terminal and transferred to said data base management system via said publically accessible digital data communication network which creates a non-relational empty data set with a specified data set ID within the data base management system.

2. (Once Amended) The improvement according to claim 1 wherein said data base management system further comprises a repository in which said non-relational empty data set is created.

3. The improvement according to claim 2 further comprising a parameter set associated with said non-SQL service request whereby said non-relational empty data set is created in accordance with said parameter set.

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4. The improvement according to claim 3 wherein said publically accessible digital data communication network further comprises the internet.

5. The improvement according to claim 4 wherein said data base management system is MAPPER.

6. An apparatus comprising:

a. an Internet terminal;

b. a publically accessible digital data communication network responsively coupled to said Internet terminal;

c. a data base management system having access to a data base responsively coupled to said Internet terminal via said publically accessible digital data communication network; and

d. a service request generated by said Internet terminal and transferred to said data base management system via said publically accessible digital data communication network which causes said data base management system to create an empty data set having a specified data set ID.

7. The apparatus of claim 6 wherein said data base management system further comprises a repository in which said empty data set is created.

8. The apparatus of claim 7 wherein said service request further comprises a non-SQL service request having a parameter set which defines said empty data set.

9. The apparatus of claim 8 wherein said data base management system further comprises MAPPER.

10. The apparatus of claim 9 wherein said publically accessible digital data communication network further comprises the world wide web.

11. A method of utilizing a user terminal to access a remote data base management system having a data base via a publically accessible digital data communication network comprising:

a. transmitting a service request from said user terminal via said publically accessible digital data communication network;

b. receiving said service request by said remote data base management system; and

c. creating a non-relational empty data set by said data base management system in response to receipt of said service request.

12. A method according to claim 11 wherein said creating step further comprises defining said non-relational empty data set in response to parameters associated with said service request.

13. A method according to claim 12 wherein said creating step further comprises creating said non-relational empty data set within a repository of said data base management system.

14. A method according to claim 13 wherein said publically accessible digital data communication network further comprises the internet.

15. A method according to claim 14 wherein said remote data base management system further comprises the MAPPER data base management system.

16. An apparatus comprising:

    a. means for permitting a user to interact using a non-SQL service request with a data base via a publically accessible digital data communication network;

    b. means responsively coupled to said permitting means via said publically accessible digital data communication network for

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offering data processing services involving access to said data base in response to said on-SQL service request; and

    c. means for creating an empty data set within said data base management system.

17. An apparatus according to claim 16 wherein said publically accessible digital data communication network further comprises the internet.

18. An apparatus according to claim 17 wherein said permitting means further comprises means for generating and transmitting said non-SQL service request requesting said data base management system to execute said creating step.

19. An apparatus according to claim 18 wherein said offering means further comprises MAPPER data base management system.

20. An apparatus according to claim 19 wherein said permitting means further comprises an industry standard personal computer.